

United States Courts  
Southern District of Texas  
FILED

MAR 19 2020

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

David J. Bradley, Clerk of Court

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_ District of \_\_\_\_

\_\_\_\_ Division

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Gregory W. Brooks Jr

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Lee H. RosenthalGovernor Greg Abbott

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Gregory W. Brooks II</u>		
All other names by which you have been known:	<u>Gra Brooks</u>		
ID Number	<u>08753347</u>		
Current Institution	<u>Harris County Jail</u>		
Address	<u>1200 BAKER ST</u>		
	<u>Houston</u> City	<u>TX</u> State	<u>77002</u> Zip Code

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Channel (11) News Station</u>		
Job or Title ( <i>if known</i> )	<u></u>		
Shield Number	<u></u>		
Employer	<u></u>		
Address	<u></u>		
	<u></u> City	<u></u> State	<u></u> Zip Code
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

**Defendant No. 2**

Name	<u>Channel (13) News Station</u>		
Job or Title ( <i>if known</i> )	<u></u>		
Shield Number	<u></u>		
Employer	<u></u>		
Address	<u></u>		
	<u></u> City	<u></u> State	<u></u> Zip Code
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

## Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

## Defendant No. 3

Name

Job or Title (if known)

Shield Number

Employer

Address

fox 26 news

City

State

Zip Code

☒ Individual capacity☒ Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

Greg Abbott

Attorney at Texas Gov

P.O. Box 12428

Austin

Texas

78711

City

State

Zip Code

☒ Individual capacity☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

## A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

## B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

• Art. 17.151, Art. 1.13, Art. 1.11a, Art. 1.19  
 • 36.06 Penal code violations  
 • Slander, Defamation + Perjury

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

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*M/A*

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

*See Attachment*

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☒ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☐ Other (explain) \_\_\_\_\_

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

*See Attachment*

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

*See Attachment*

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C. What date and approximate time did the events giving rise to your claim(s) occur?

See 4:19-CV-05011

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See 4:19-CV-05011

## V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

See 4:19-CV-05011

## VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

\$(700) Seven hundred Dollars per second: Sept. 14, 2018 = until Reheif made

1. per minute: \$42,000<sup>00</sup>2. per hour: \$2,520,000<sup>00</sup>3. per Day: \$60,480,000<sup>00</sup> (10%) Interest: 60,480,000<sup>00</sup>4. per month: \$1,814,400,000<sup>00</sup>

(Provisions)

1. Payable in 30 Days of the filing of this civil suit or interest start's

2. Payable in \$(20) Twenty Dollar GOLD peace's are fair value to the Bank!

3. See Provisions Applied to my other case's in court!!

4. The time's four clause in Active on this civil suit:  $(80 \times 4 = 320)$ 

Sect.

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**VII. Exhaustion of Administrative Remedies Administrative Procedures**

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Harris county Jail

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)?

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- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☒ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

See 4:19-CV-05011

2. What did you claim in your grievance?

See 4:19-CV-05011

3. What was the result, if any?

See 4:19-CV-05011

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

See 4:19-CV-05011

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**F. If you did not file a grievance:**

1. If there are any reasons why you did not file a grievance, state them here:

N/A

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

N/A

**G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.**

N/A

*(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)*

**VIII. Previous Lawsuits**

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☒ Yes

☐ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

See 4:19-CV-05011



## Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☒ Yes

☐ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Gregory W. Brooks

Defendant(s) Houston Police Department

2. Court (If federal court, name the district; if state court, name the county and State)

Bob CASEY U.S. DISTRICT COURT house

3. Docket or index number

4217-CV-05011

4. Name of Judge assigned to your case

N/A

5. Approximate date of filing lawsuit

Dec, 23, 2019

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition.

Feb, 18, 2020

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

DISMISSED with out Pre-Judice = 1415(a)

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Yes!!

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☒ Yes

☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Gregory W. Brooks II

Defendant(s) Bob Casey U.S. District Court house

2. Court (If federal court, name the district; if state court, name the county and State)

Bob Casey U.S. District Court house

3. Docket or index number

4:20-CV-00407

4. Name of Judge assigned to your case

Nancy E. Atlas

5. Approximate date of filing lawsuit

N/A

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition

Dismissed

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

1815(g)

## IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

## A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

(Post Dated) 3/23/2020

(Monday) (Become's Active)

(file now!!) Take note!!

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Gregory W. Brooks II  
Gregory W. Brooks II  
02753347  
1200 Baker St  
Houston TX 77002  
City State Zip Code

## B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

United States District Court  
Southern District of Texas  
FILED

MAR 19 2020

David J. Bradley, Clerk of Court

(Official Document)

Today's Date: 3/13/2020

Bibleverse:

- Civil - suits -

Active: 3/23/2020

3:12

I'm Bringing this civil suit Against the people & Agency's in this 1983-form for the violation of my civil Rights & my given Constitutional rights, considering the official status & position each figure as Defendant in this civil suit holds. They would be considered in an Administrative position or in a position to provide Assistance to me in this matter of the Harris County Justice System violating my rights, slander & Defamation, obstruction & Retaliation, violating my Due Process, Tampering with official government Documents & more.

This civil suit Represents the failure to Assist me Adequately in this matter by a failure to Respond to my letters in a meaningful Amount of time, & it Also reflects the Hate surrounding the facts of the matter. This can Also be viewed as a Hate crime. Give the circumstance it's True remains considering the position each Defendant holds.

The Situation is ready to be viewed as aggress in association to the crime committed in fact. In other words ALL Party's involved with all Dementions of the violations to speak of. That are at hand in this matter. Are Also Responsible for the infraction in mass, as in to be of assistance or associate to the culprit, or in conspiracy with, or to co-here with all violations Against me.

I've contacted state officials & media Agency's for Assistance in Bringing a 1983 civil suit in the matter of the violations Against me they have not contacted me back in a meaningful Amount of time in Reflection to civil suits I've filed in court for forms purposes.

The Prisoner Litigation Reform Act (PLRA) has Bared me from receiving court fee's via the Assistance of the court to an indigent inmate. In Response to this I've contacted state officials & media Agency's & more including the N.A.A.C.P. All Agency's have failed to Assist me in a meaningful Amount of time & most of them have not contacted me Back at ALL example the Houston chronicle news Paper. This Letter will Be used to bring a civil suit to ALL state officials & Agency's I've contacted that have not provided the court fee's. I need to proceed in forma pauperis, or that have not given support in this matter.

My rights as an American citizen have Been violated with records to prove so. the jail Records at Harris county jail & the courts Records in the United State's courts will show all violations I speak of. This Situation Also to show how much are rights are Actually valued as citizen's.

Also the facts remain that Perjury is also a factor in this situation from when it started & still is how even after the judgment has been served the infractions still are presented in & through the court as a means of not only disrespect But Also to violate me in this matter as an American citizen.

Please review case's that Apply: 4:17-CV-05011 & 4:20-CV-00816 & 4:20-CV-00808, 4:20-CV-00807 & more under my name in the United States court house for civil suits.

Gregory W. Brooks II    spn#02753347    X ~~Gregory W. Brooks II~~    TDC#02250041

**HARRIS COUNTY SHERIFF'S OFFICE JAIL**

Name: Gregory W. Brooks II  
SPN: 02758347 Cell: 5D113  
Street: 1200 BAKER ST  
HOUSTON, TEXAS 77002



**INDIGENT**

United States Courts  
Southern District of Texas  
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Houston, TX 77208



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